

**UNITED STATES BANKRUPTCY COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI**

**In re: Jessie Bernard  
Debtor**

**CHAPTER 13  
CASE NO. 19-01861-NPO**

**OBJECTION TO CHAPTER 13 PLAN CONFIRMATION**

**COMES NOW**, Specialized Loan Servicing LLC as servicing agent for Deutsche Bank National Trust Company, as Trustee for HIS Asset Securitization Corporation Trust 2006-WMC1, Mortgage Pass-Through Certificates, Series 2006-WMC1 (“Objector”), a secured creditor herein, and objects to confirmation of the Chapter 13 Plan on the following grounds:

1. Objector holds a claim against the Debtor which is secured by certain real estate located at 5590 Nailor Road, Vicksburg, MS 39180 (“Property”).

2. Debtor’s Chapter 13 Plan proposes to pay the arrears at \$12,000.00 and post-petition monthly payments at \$1,300.00.

3. The actual amount of arrears is \$14,827.69 and the actual amount of post-petition monthly payments is \$1,338.54.

**WHEREFORE, PREMISES CONSIDERED**, Objector files its Objection to Chapter 13 Plan Confirmation and prays for a payment of the full amount of arrears of \$14,827.69 and the post-petition monthly payments of \$1,338.54 and for such other and more general relief as is just.

Respectfully submitted,

**BENNETT LOTTERHOS SULSER  
& WILSON, P.A.**

/s/ Charles Frank Fair Barbour

**Charles Frank Fair Barbour, MSB # 99520**

BENNETT LOTTERHOS SULSER

& WILSON, P.A.

190 East Capitol Street, Suite 650 (39201)

Post Office Box 98

Jackson, Mississippi 39205-0098

Telephone: (601) 944-0466

Facsimile: (601) 944-0467

[cbarbour@blswlaw.com](mailto:cbarbour@blswlaw.com)

**CERTIFICATE OF SERVICE**

I, Charles Frank Fair Barbour, do hereby certify this day that I electronically filed the above and foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Robert Rex McRaney, Jr. at [mcraneymcraney@bellsouth.net](mailto:mcraneymcraney@bellsouth.net)

Harold J. Barkley Jr. at [HJB@HBarkley13.com](mailto:HJB@HBarkley13.com)

US Trustee at [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

/s/ Charles Frank Fair Barbour